

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	CRIMINAL NO. <u>14-</u>
<b>v.</b>	<b>:</b>	DATE FILED: _____
<b>JOEL ROSENBERG</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a "Paul"</b>	<b>:</b>	<b>18 U.S.C. § 2422(b) (use of an interstate</b>
	<b>:</b>	<b>commerce facility to entice a minor to</b>
	<b>:</b>	<b>engage in sexual conduct - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2423(b) (interstate travel with</b>
	<b>:</b>	<b>the intent to engage in illicit sexual</b>
	<b>:</b>	<b>conduct with a minor - 1 count)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

In or about September 2013 through on or about October 20, 2013, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

**JOEL ROSENBERG,  
a/k/a "Paul"**

used a facility and means of interstate and foreign commerce, that is, the Internet, to attempt to persuade, induce, entice and coerce Minor #1, who had not attained the age of 18 years, to engage in sexual activity, for which any person could be charged with a criminal offense.

In violation of Title 18, United States Code, Section 2422(b).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 20, 2013, in the Eastern District of Pennsylvania, and elsewhere,  
the defendant,

**JOEL ROSENBERG,  
a/k/a "Paul"**

traveled in interstate commerce, that is, from the State of New Jersey to the Commonwealth of  
Pennsylvania, for the purpose of engaging in illicit sexual conduct with a minor..

In violation of Title 18, United States Code, Section 2423(b).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 2422(b) and 2423(b), as set forth in this indictment, defendant

**JOEL ROSENBERG,  
a/k/a "Paul"**

shall forfeit to the United States of America any visual depiction charged in the indictment, and any matter containing such visual depictions, and any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 18, United States Code, Sections 2422(b) and 2423(b), as charged in this indictment, including, but not limited to:

1. Two USB flash drives
2. Samsung cell phone SGH-1747, serial number 351873050818157
3. Garmin GPS, serial number 2J3147918
4. Tomtom GPS, serial number V5223710255
5. Dell Latitude D610 laptop computer, service tag CJF1XB1

If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been comingled with other property which cannot be divided,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

\_\_\_\_\_  
GRAND JURY FOREPERSON

  
\_\_\_\_\_  
ZANE DAVID MEMEGER  
United States Attorney